

EXHIBIT “D”

ORIGINAL

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JAMES SNOWDEN,

Plaintiff,

-against-

Case No.

17-cv-02631-VB

DOUGLAS SOLOMON, JILL WEYERS,
CARMEN RUE, VILLAGE OF MONTICELLO,
ROBERT MIR, RAYMOND NARGIZIAN,

Defendants.
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EXAMINATION BEFORE TRIAL

of the Plaintiff, JAMES SNOWDEN, held on
November 12, 2018, commencing at 10:13 a.m., at
the law offices of Sussman & Watkins, LLP, One
Railroad Avenue, Goshen, New York, before Lora
J. Curatolo, Certified Shorthand Reporter and
Notary Public in and for the State of New York.

LORA J. CURATOLO
NYS Certified Shorthand Reporter
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(845) 464-7734

Lora J. Curatolo (845) 464-7734

1 James Snowden

2 Q. And how about with respect to
3 notices of violation?

4 A. Yes.

5 Q. You issue those?

6 A. Yes.

7 Q. Did you have to consult anyone
8 before issuing a notice of violation?

9 A. No, not really.

10 Q. After your employment was terminated
11 at the village, did you attempt to obtain other
12 employment with any other municipalities?

13 A. I considered it but what was -- what
14 I was going through, it was just I didn't want
15 to put myself in a situation where I would be
16 turned down and then never be -- I was trying to
17 clear my name first. I didn't want to put
18 myself in a situation to be turned down and I
19 wouldn't be able to apply again. If I clear my
20 name then I can take care of that.

21 Q. And to date have you attempted to
22 obtain any jobs with any municipalities after
23 your termination from the village?

24 A. Not at this point, sir.

25 Q. And other than municipalities have

1 James Snowden

2 you sought employment with any other companies?

3 A. No.

4 Q. After your termination, that you've
5 worked in the business that you and your brother
6 own?

7 A. Yes.

8 Q. Do you intend to seek other
9 employment at some point in time?

10 A. I intend to try to get my retirement
11 back. I lost my retirement. Yes, hopefully.

12 Q. To work with another municipality?

13 A. Yes.

1 James Snowden

2 A. No.

3 Q. How much, approximately, have you
4 earned this year in income?

5 A. I don't know. Probably 25,000 my
6 taxes will be. Probably 20, 25,000.

7 Q. And just to the record is clear,
8 have you applied for any jobs after your
9 termination from the village?

10 A. No.

11 MR. PUGLIELLE: Thank you. That's
12 all I have.

13

14 EXAMINATION BY MR. SUSSMAN:

15 Q. I have a few questions to follow up
16 on some of the issues that Mr. Puglielle raised
17 with you. Just a few.

18 So Police Chief Mir gave testimony
19 at an administrative hearing that you attended;
20 did he not?

21 A. Yes.

22 Q. And do you recall Mr. Mir indicating
23 that he had seen you waving a piece of paper --

24 A. Yes.

25 Q. -- at a person who was going to be

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C E R T I F I C A T I O N

I, Lora J. Curatolo, Certified
Shorthand Reporter, Certificate No. 1031-1, and
Notary Public of the State of New York, do
hereby certify that I recorded stenographically
the proceedings herein at the time and place
noted in the heading hereof, and that the
foregoing transcript is true and accurate to the
best of my knowledge, skill and ability.

IN WITNESS WHEREOF, I have hereunto
set my hand this 1st day of December 2018.

LORA J. CURATOLO, CSR